
From: Claudia Juan Garcia
Sent: Monday, September 24, 2018 2:06 PM
To: Miguel Ángel Serrano-Urdaz
Cc: Wandymar Burgos Vargas; Iván J. Ramírez Camacho; Carolina Velaz Rivero
Subject: Jose Malvet Santiago - 2007-07-0025

Dear counsel:

After having the opportunity to evaluate movant's allegations and the information provided by the Commonwealth's legal representatives, the Commonwealth has determined, in coordination with AAFAF legal representatives, that the best course of action in the case **Jose Malvet Santiago - 2007-07-0025** is "to consent to modification of the stay solely to the limited extent necessary to allow the Petition to proceed to final judgment before the administrative forum"; provided, however, the Title III Stay shall continue to apply in all other respects to the Prepetition Action including, but not limited to the execution and enforcement of any judgment and for any claims for money damages and provisional remedies against the Commonwealth or any other Title III Debtor."

If movant is in agreement with this modification, as expressed above, please inform forthwith so that we can begin drafting a lift of stay stipulation.

Any agreement is subject to review by the FOMB, as the Commonwealth's representative.

Please, **confirm receipt** of this electronic mail.

If you have any questions, feel free to contact me.

Cordially,

Lcda. Claudia A. Juan García
Fiscal Auxiliar III
División de Recursos Extraordinarios y Política Pública
Departamento de Justicia
P.O. Box 9020192
San Juan, Puerto Rico 00902-0192
Tél. (787) 721-2900, ext. 2603
cjuan@justicia.pr.gov



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"Para tener éxito no tienes que hacer cosas extraordinarias, tienes que hacer cosas ordinarias extraordinariamente bien".

From: Claudia Juan Garcia

Sent: Friday, July 27, 2018 11:22 AM

To: 'Miguel Ángel Serrano-Urdaz'; hermann.bauer@oneillborges.com;
ubaldo.fernandez@oneillborges.com; dperez@omm.com; andres@awllaw.com

Subject: RE: Lift of Stay Notice - 17-3283 In re Financial Oversight Board as rep. of Commonwealth of Puerto Rico

Dear Counsel:

I acknowledge receipt of your Notice informing your intention of filing a motion to lift the automatic stay before the United States District Court of Puerto Rico (Taylor Swain, D.J.) of various cases. We will review the Notice regarding cases 1, 3, 4 and 5 (that are the cases against the Commonwealth and/or an Agency) and circle back with you. The case 2 is against PRASA; the case 6 is against Retirement System Board and the case 7 against the Municipality of Salinas.

Please, confirm receipt of this electronic mail.

If you have any questions, feel free to contact me.

Cordially,

Lcda. Claudia A. Juan García
Fiscal Auxiliar III
División de Recursos Extraordinarios y Política Pública
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"Para tener éxito no tienes que hacer cosas extraordinarias, tienes que hacer cosas ordinarias extraordinariamente bien".

From: Miguel Ángel Serrano-Urdaz [<mailto:serrano.urdaz.law@hotmail.com>]

Sent: Wednesday, July 25, 2018 4:52 PM

To: hermann.bauer@oneillborges.com; ubaldo.fernandez@oneillborges.com; dperez@omm.com; andres@awllaw.com

Cc: Claudia Juan Garcia

Subject: Lift of Stay Notice - 17-3283 In re Financial Oversight Board as rep. of Commonwealth of Puerto Rico

Dear Counsel:

Pursuant to Part III Q of the case management procedures for the case of caption, I advise, on behalf of my clients, of their intent to seek relief from the automatic stay in order to continue prosecution of the cases listed below.

The clients and their cases are:

1. Juan A. Santiago Meléndez

Administrative Case 2008-07-0094 before the Public Service Appeals Commission – Request for the Commission to determine Mr. Santiago's current applicable salary according to his job position's pay level. This case is intrinsically related to Civil Case KAC2016-0328, for which Mr. Santiago and Debtors signed a stipulation to modify the stay. The Commission's decision needs to be reviewed by the Superior Court in order to determine the amounts owed to Mr. Santiago. These have been estimated at around \$30,000. The case was stayed prior to final hearing.

2. Julio Rancel López

Civil Case GDP2013-0152 – Mandamus; injunction; torts claim. Mr. Rancel is requesting an order from the Puerto Rico Superior Court for PRASA to provide health coverage for Mrs. Rancel and his daughter. Mr. Rancel's late wife was a PRASA employee and after her death, per the applicable collective bargaining agreement, Mr. Rancel and his daughter were eligible as beneficiaries of her

health plan. Damages and loss of health coverage are estimated at \$100,000. The case was stayed in the midst of litigation.

3. José Miguel Malvet Santiago

Administrative Case 2007-07-0025 before the Public Service Appeals Commission – Claim for wrongful termination of employment and subsequent loss of wages. The value of Mr. Malvet's claim is estimated at \$132,000. The case was stayed in the midst of litigation.

4. Edwin F. Bones Díaz

Civil Case GDP2017-0103 – Violation of civil rights; torts; hostile work environment – Claim for discrimination in the work place which eventually led to emotional distress and other damages. Debtor's claim is in the amount of \$500,000. Defendant was served and the case was stayed shortly thereafter.

5. Rafael Bonilla Rivera

Administrative Case 2007-02-0829 before the Public Service Appeals Commission – Claim for wrongful termination and request for reinstatement to employment. Loss of wages is estimated at \$100,000. The case was stayed prior to final hearing.

6. Hiram Velázquez Rivera

Administrative Case 2015-0334 before the Retirement Systems Board (*Junta de Sistemas de Retiro*) – Claim of eligibility to disability benefits. The case was stayed in the midst of litigation. Debtor's claim is estimated at \$75,000.

7. Lisbet Torres Gutiérrez

Administrative Case 2005-07-0107 before the Public Service Appeals Commission – Request for review and order to the Salinas municipality to follow correct procedures in evaluating the promotion of Ms. Torres to a higher rank. Final hearing was pending when the case was stayed. No amounts are sought in this case.

We are open to coming to a stay modification agreement that will minimize expenses to your clients and ours.

Kind regards

Miguel Ángel Serrano Urdaz, Esq.

Malo periculosam libertatem quam quietum servitium

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